

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS *FILED*
U.S. DISTRICT COURT
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UNITED STATES OF AMERICA,)
v.) U.S. DISTRICT COURT
PHILIP ALBERT, Jr. et. al.,) DISTRICT OF MASSACHUSETTS
Defendants.) CRIMINAL COMPLAINT
CASE NUMBER: 04-1809-CBS

MOTION TO AMEND CONDITIONS OF PRE-TRIAL RELEASE

Now comes the defendant, Philip Albert, Jr., through counsel, and moves this Court to amend the conditions of his pre-trial release to allow out of state travel for a specific and limited period of time.

As grounds therefore, the defendant states that out of state travel is necessary for him to attend a previously scheduled family reunion and to visit with his sister who is scheduled to give birth. Defendant states that his travel destination will be limited to Delaware, Ohio from August 9, 2004 through August 19, 2004.

Pre-trial services and the Office of the United States Attorney has informed counsel for the defendant that there is no opposition to allowance of the within motion.

WHEREFORE, the defendant respectfully requests that this Court amend his conditions of pre-trial release to allow travel to the State of Ohio from August 9, 2004 through August 19, 2004.

Respectfully Submitted,

Phillip Albert, Jr.
by his attorneys,



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CERTIFICATE OF SERVICE

I, Marc R. Salinas, hereby certify that on this 15th day of July, 2004, I served a true copy of the within document, via first class mail postage pre-paid, to the following counsel of record.

Michael J. Pelgro
Office of the United States Attorney
One Courthouse Way, Suite 9200
Boston, MA 02110



Marc R. Salinas